

# **Libby Community Advisory Group**

## **Meeting Summary**

### **August 14, 2003**

#### **Introductions**

Gerald Mueller and members of the Libby Community Advisory Group (CAG) introduced themselves. A list of the members and visitors in attendance is attached below as Appendix 1.

#### **Agenda**

The CAG agreed to the following agenda for this meeting:

- July 10, 2003 Meeting Summary
- EPA Report
- CORA Report
- TAG Report
- D.C. Orr Presentation
- Public Comment

#### **July 10, 2003 Meeting Summary**

Gerald Mueller noted that the July 10, 2003 CAG meeting summary differed from previous summaries because it included clarifications added by the EPA Project Manager, Jim Christiansen, although he did not attend the meeting. Mr. Mueller explained that it has always been his practice to send the initial draft of the summary to EPA and others making technical presentations at the meeting for their review to ensure summary accuracy. The version of the summaries sent out to the CAG and members of the public has reflected this technical review. In the case of the July 10 summary, Mr. Christiansen reviewed the draft and offered clarifications to answers given in the meeting by an EPA contractor. Mr. Mueller stated that he decided to include the clarifications rather than waiting for the August meeting to provide CAG members and the public accurate information sooner. A foot note was included in the summary stating that Mr. Christiansen did not attend the July 10 meeting and the purpose of the clarifications. So that they could be easily identified, the clarifications were printed in a different type font. Mr. Mueller asked the CAG if anyone objected to including such clarifications in the future, if the need again arises, and no member objected.

#### **EPA Report**

Jim Christiansen and Wendy Thomi reported on behalf of EPA . Mr. Christiansen covered the cleanup update, including the boat ramp, Flyway, and rail yard cleanups, and the new EPA Administrator. Ms. Thomi addressed the informational materials.

Cleanup Update - About 100 residential cleanups have been finished to date. This number is behind where EPA expected to be because several cleanups have proven to be more difficult than expected. EPA has opted to try to get the cleanups done right rather than quickly. The target of completing 200 properties by the end of the year has not changed. Cleanup of 10 to 15 properties is currently underway. Mr. Christiansen stated that mistakes have been made in some of the cleanups, while others have gone well. EPA is learning during the first year and that the lessons will help maximize the effort during the second year. Although EPA has not met all

expectations, Mr. Christiansen said that things will get better.

Mr. Christiansen reported some good funding news. The current fiscal year, FY2003, ends on September 30, and FY2004 begins the next day. Because in recent years the Congress has not completed appropriation bills on time, the transition from one fiscal year to the next has caused money availability problems. To tide the Libby cleanup over during this fiscal year transition, EPA headquarters has made available \$2 million. This \$2 million will be in addition to money provided by the FY2004 budget.

Boat Ramp - Mr. Christiansen summarized the activity at the boat ramp which is on the site of the former W.R. Grace export plant. When constructing the boat ramp, the City of Libby encountered vermiculite. Work was stopped, and the area of heavy contamination was covered and fenced to prevent public access to it. The City delivered a cleanup plan to EPA last week, and the plan is under review. The plan includes both sampling and cleanup activities. EPA welcomes public comments and suggestions regarding the plan. EPA will present the plan to the City Council at its September meeting.

BN Railroad Yard - BN has started cleanup of the rail yard. Contaminated dirt is being removed, and the ballast under the track will be vacuumed. All contaminated material will be transported to the asbestos disposal cell at the Lincoln County landfill. The estimated time to finishing this cleanup is 6 weeks to 2 months.

Flyway - The southwest portion of this property was cleaned previously. No additional cleanup activity will occur this year because of funding limitations. EPA recently completed a legal agreement with W.R. Grace (WRG) providing that WRG will clean the portion of this site that it owns. WRG will now develop a cleanup work plan subject to approval by EPA and the bankruptcy court. About 6 weeks to 2 months will be required to complete the cleanup once work begins. This site also includes highway right-of-way and some private land not owned by WRG. EPA will clean these portions of the site.

New EPA Administrator - President Bush recently designated current Utah Governor Mike Leavitt to be the new EPA Administrator. Mr. Christiansen said that he has conducted cleanups in Utah while Mr. Leavitt has been Governor, and the state sometimes was more aggressive in seeking cleanup than was EPA.

*Audience Member Question - Who did EPA contact at the City concerning export plant cleanup?*  
Answer - Dan Thede and Tony Berget.

*Audience Member Question - Will EPA present the work plan to the City Council?*  
Answer - Yes. The City owns the land.

*Audience Member Question - I attended a meeting of the City Council last November and was told that Mayor Berget cannot be involved legally with the export plant cleanup because of a conflict of interest. You have failed us in this regard. Can you change this situation so that you do not work with the Mayor?*

Answer - I am not aware of a conflict of interest that the Mayor has that should prevent us from dealing with him regarding the cleanup of this property, and we will continue to work with him.

*Audience Member Comment - The Mayor will fulfill his obligation to WRG through this cleanup.*

Response - In the unilateral cleanup order to WRG for the export plant site, Paul Peronard drew the cleanup border at the property boundary. This has not proven to be sufficient. We have asked an EPA attorney about extending the border of the cleanup order to include property not owned by WRG and were told no because the bankruptcy court would not approve WRG funding for activities that would not benefit its properties. EPA intends to seek full recovery from WRG for costs of cleaning the portions of the export plant site which WRG does not own.

*Audience Member Question - Will the cleanup work plan be visible and open to the public?*

Answer - Yes. The plan is available at the EPA Information Center.

*Audience Member Question - Will air quality monitoring occur at the export plant site?*

Answer - Yes. Monitoring will occur at the Flyway, boat ramp, and other cleanups. We are not sampling at the boat ramp now because cleanup activities are not yet underway.

*Audience Member Question - The boat ramp is not idle. EPA contractors are moving through the area. Why aren't you sampling now?*

Answer - The immediate hazard area has been covered and fenced. The remainder of the area presents a long-term exposure risk much like many Libby gardens contaminated with vermiculite, so like the gardens the boat ramp area will be cleaned. The area where trucks are now driving has been covered with gravel.

*CAG Member Question - Who would have had to pay for the boat ramp cleanup had the contamination been discovered after the Superfund cleanup was finished?*

Answer - After the Superfund cleanup comes the operation and maintenance (O&M) phase. O&M is the responsibility of the state when government has done the cleanup work. If private parties have done the cleanup, then they remain responsible for the O&M. A long-term plan is needed to address the later cleanups, i.e. cleanup of contamination that EPA did not find or opted not to remove. This plan will be developed.

*CAG Member Question - Did EPA recently cut the cleanup work week back from six to five days?*

Answer - Yes. Three weeks ago the work week was cut to five days. We did this for two reasons. First, we had funding concerns. A six day work week meant one day of overtime at time and a half. By eliminating work on Saturday, the cleanup could be extended by two weeks with no additional funding. Second, we were concerned about crew burnout. The sixty hour work week was hard on the workers, particularly because of the high day-time temperatures. We plan to return to the sixty hour work week by winter.

*CAG Member Question - When do you expect to be back to six ten-hour work days?*

Answer - Sometime after FY2004 funding arrives.

*CAG Member Question - Does this mean that the cleanups will not be as good until FY2004 funding becomes available?*

Answer - No. Cleanups will continue at the same quality.

*CAG Member Question - Would you please describe the vacuuming of the railroad track ballast?*

Answer - The rock ballast under the tracks will be vacuumed using a high power vacuum truck.

To avoid sucking up the rock, the vacuum hose will have a screen on its end. The material taken into the vacuum truck will be transported to the Lincoln County landfill asbestos cell for disposal. We are not sure how well the vacuuming will work, and sampling will be done to check. The alternative to vacuuming would require closing the tracks to train traffic during the cleanup.

*CAG Member Question - Will you conduct the sampling when trains are passing by and shaking the ballast?*

Answer - Yes. We will sample when trains are passing to test the effectiveness of the ballast vacuuming.

#### Informational Materials

Wendy Thomi stated that because of public concerns about the ongoing cleanup activities, EPA is developing additional outreach materials. EPA will produce a 10 - 12 minute video showing the entire cleanup process. A crew will be filming cleanups at different locations around town during September. EPA is also developing a detailed fact sheet on the residential property cleanups. EPA will use the video and work sheet when contractors meet with households prior to beginning property cleanups. Another fact sheet will also address the triggers for a cleanup and the air and soil sampling criteria by which EPA will determine whether a property is “clean” after a cleanup. EPA will also develop a fact sheet entitled “Living with Vermiculite” to provide a contact list and to describe the precautions building owners and residents should take before the EPA cleanup occurs and after EPA leaves the community. Finally, EPA is updating its website addressing Libby adding more information and more links to other related web sites.

*CAG Member Comment - Since EPA will be intentionally leaving vermiculite behind in Libby, you should title your fact sheet “Living with Vermiculite from Now On.”*

Response - We are open to discussing the fact sheet title.

*Audience Member Comment - I found a lot of information at [www.cnet.com](http://www.cnet.com) by searching for the words tremolite and asbestos disease, although I can't vouch for the quality of the information.*

#### **CORA Update**

Tanis Lincoln, a social worker with the Center for Asbestos Related Diseases (CARD) reported on the CARD Outreach for Recovery Assistance (CORA) Project using a handout contained below in Appendix 2. Using funding from a grant from the Center for Mental Health Services that will expire in September, the CORA project has been working to address mental health needs of the Libby community arising from the tremolite exposure in Libby and to prepare a training manual for use by other communities facing similar circumstances. CORA intends to apply for an EPA Environmental Justice Grant to continue to provide direct mental health services to people in the community. CORA's partners in applying for the grant will include: the Mental Health Center, the Montana Asbestos Screening and Surveillance Activity (MASSA), St. John's Lutheran Hospital, and Lincoln County's Rural Health Outreach Grant Program (RHOG). Other potential partners include the Libby Care Center, the Community Health Center (CHC), the Libby School District, and the Health Community Initiative. Ms. Lincoln asked the CAG for a letter of support for the grant.

*CAG Member Question - How is the CARD Clinic currently funded?*

Answer by CARD Board Members LeRoy Thom and Gayla Benefield - The main source of funding is billing patients for services. A long-term goal of the CARD Board of Directors is to develop a research component that would be grant funded. This weekend will be the first of two conferences with doctors who treat asbestos disease and who know if Libby would be a viable research site and how to obtain research funding. CARD Board members will be meeting with UM Professor Holian to discuss future funding. The purpose of the research would be to explore the pathways to treatment and a cure for asbestos disease and to provide health care to the 1,100 people in Libby with the disease. The reason that CARD left St. John's Lutheran Hospital is that the Hospital is not a research institution.

*CAG Member Question - Does any of the \$250,000 provided by WRG go to the CARD Clinic?*

Answer - No. The money from WRG goes to the Hospital.

***CAG Action - The CAG agreed to provide CORA a letter of support for the Environmental Justice Grant application. Ms. Lincoln agreed to draft a letter and email it to Mr. Mueller who will include it with the summary of this meeting. (See Appendix 3 for the draft letter of support.) The CAG will then take action on the draft letter at its next meeting on September 11.***

## **TAG Report**

George Keck reported on behalf of the Technical Advisory Group (TAG). The mission of the TAG is to achieve satisfactory superfund site remedial action through community involvement and participation as provided for in all phases of the EPA (NPL) cleanup process. In carrying out this mission, TAG is attempting to walk a fine line between representing the community and acknowledging EPA's good effort here. Mr. Keck passed out copies of the TAG white paper regarding perceived health hazards associated with vermiculite after cleanup by EPA contractors and an August 8 letter to Jim Christiansen containing action items resulting from a meeting of the special board meeting of TAG on July 15, 2003. A copy of the white paper was provided with the July 10, 2003 CAG meeting summary. A copy of the August 8, 2003 letter is included below as Appendix 4. Mr. Keck indicated that the most significant of the August 8 letter action items were numbers 1, the policy shift from "removal" to "containment" to "minimal release"; 7, worker health and safety procedures; and 11, the flaws in Dr. Chris Weis risk assessment work. Mr. Christiansen stated that EPA would provide written answers to the items in the August 8 letter to the TAG by its September meeting.

*CAG Member Comment - Action item 11 in the August 8 letter references "flawed and outdated" studies and risk models. I believe Dr. Weis did an good job. The flaw was not in Dr. Weis' work but in the Integrated Risk Information System (IRIS) files that he had to use. The flaw was the failure of IRIS to recognize the different level of toxicity of different asbestos fiber types.*

Response- This comment is correct. IRIS calculates risk based on a single toxicity factor, and does not differentiate for the toxicity of tremolite asbestos.

*CAG Member Question - Is EPA mandated to answer the TAG's questions?*

Answer - No, but we intend to do so.

*CAG Member Question - Will the answers cause a change to EPA policy?*

Answer - While the TAG does not have the authority to require change, the answers may result in a change. Information and questions from other members of the public can have a similar effect.

*CAG Member Question - If the TAG and Libby community found something wrong with the cleanup, what is the recourse?*

Answer - While EPA must retain the authority to make the cleanup decisions, we do take seriously input from the TAG, the CAG, and the public.

*Audience Member Question - In action item #10 in the August 8 letter, reference is made to EPA's comfort with a small amount of exposure. What is meant by the reference?*

Answer - EPA makes its decision about how clean "clean" must be based on a risk assessment. There will be some exposure to vermiculite in Libby and across the country after the Superfund cleanups are finished. The level of acceptable exposure will be based on the best available science.

*Audience Member Question - My house was cleaned and I had new carpet installed two years ago. I recently changed carpet shampoos and I have found vermiculite in my waste water. Should I be concerned?*

Answer - I don't know what was in your waste water for certain. One or two days of exposure to low levels of vermiculite is not a concern.

*Audience Member Comment - I wonder if the source of the vermiculite was my yard.*

Response - If you are concerned about the yard being a source, EPA may take some yard samples.

*CAG Member Comment - We were told that in cleaning our house that everything would be put back the way it was. Some of our furniture was put back in plastic bags.*

Response - We can remove the plastic bags.

## **D.C. Orr Presentation**

D.C. Orr discussed several concerns. First, the public does not have an opportunity to respond to the clarifications in the meeting summary by Mr. Christiansen even though he did not attend the CAG meeting. Second, criminal charges should be brought against the City for attempting to cover up the contamination at the boat ramp. The loader operator has said that when the contamination was uncovered, his supervisor told him to ignore it. The supervisor reports to the Mayor. The City did not report the contamination to EPA, a woman walking her dog in the area did. The Mayor has a legal conflict of interest but EPA is still allowing him to participate in the cleanup process.

Response by Gerald Mueller - The situation with the July 10, 2003 meeting summary was discussed at the beginning of the meeting. I do make errors when summarizing the meeting which is why I send it to meeting presenters for a technical review. Members of the public who wish to do so can bring up needed changes at the next CAG meeting.

Response by Jim Christiansen - EPA is not aware of a legal conflict of interest on the part of the Mayor and will continue to consult him in his official capacity as appropriate in the cleanup process. EPA is not aware of any action by the City that warrants criminal prosecution.

## **Public Comment**

*Audience Member Question - Is the asbestos contamination a regulated substance?*

Answer - No. Asbestos must be present in concentrations of 1% or greater to be regulated. The vast majority of the samples taken of the contamination we are addressing contains less than 1% asbestos.

*Audience Member Comment - The 1% level is very misleading. Levels less than 1% asbestos are still unsafe. There is no safe level of asbestos exposure.*

Response by Jim Christiansen - We live in a world with risk. EPA must use its judgment about acceptable levels of risk in Superfund cleanups. EPA uses a standard of 1 excess cancer death per 100,000. While no one wants to be the 1 excess death, we have said many times that as the risk levels drop the decisions become harder.

*Audience Member Question - What are the guidelines for the cleanups?*

Answer by Jim Christiansen - There are a number of criteria, and we are developing a fact sheet to answer this question.

*Audience Member Question - Has EPA recently changed from a fan to a blower in residential cleanups?*

Answer by Jim Christiansen - Yes, we made this change to move to a more aggressive clearance standard. We intend to go back to some of the previously cleared houses and resample using the new technique.

**Appendix 1**  
**CAG Member & Guest Attendance List**  
**August 14, 2003**

<b>Members</b>	<b>Group/Organization Represented</b>
George Keck	Technical Advisory Group (TAG)
Sandy Wagner	Community Health Center/TAG
Bob Zimmerman	Cabinet Resources Group
Clinton Maynard	Area Asbestos Research Group
Craig French	Montana Department of Environmental Quality
George Bauer	City of Libby
Bob Dedrick	Asbestos Victim
Ken Hays	Senior Citizens
David F. Latham	<i>The Montanian Newspaper</i>
Wendy Thomi	EPA Community Involvement
Jim Christiansen	EPA Project Manager
Gary Swenson	Libby Volunteer Fire Department
Leroy Thom	Former Grace Employee
Gayla Benefield	Lincoln County Asbestos Victims Relief Organization
Eileen Carney	State Representative
Norita Skramstad	Asbestos Victim



# CARD

Center for Asbestos Related Diseases

## Environmental Justice Collaborative Problem Solving Grant CARD Outreach for Recovery Assistance (CORA) Proposal Summary

The vision of The Center for Asbestos Related Disease (CARD) is to establish a comprehensive and holistic approach for the many community members affected by asbestos related diseases (ARD). The CARD clinic staff, and many other professionals who provide services related to ARD have recognized that psychological and social impacts go hand in hand with the psychological impacts of ARD stemming from both occupational and community exposure.

### **Statement of Problem**

The focus of this project will be to address the clinical and sub-clinical mental health issues resulting from the tremolite asbestos exposure in Libby Montana. This includes mental health issues associated with: exposure/risk, diagnosis, disease, and long-term care (which includes health care, palliative care, research, and economics).

*Project Vision: Through a collaborative partnership with multiple entities, the CARD seeks to address the various mental health needs of all segments of the community, throughout Lincoln county, impacted by Libby tremolite asbestos exposure. We will provide the needed emotional and mental health support and services to help identify the psychological and social impacts they may experience; and to develop skills and understanding to successfully adopt to the extreme conditions that they currently face. Each individual and organization contacted through this project will additionally be empowered to seek their own unique solutions to the problems they are confronting.*

### **Goals and Objectives:**

1. Develop a collaborative referral network to mental and other ARD related needs.
2. Develop and disseminate written mental health materials and provide education on mental health impacts to individuals and organizations.
3. To provide to all CARD patients and other people receiving medical screening and/or services for ARD (on an individual, family or group basis):
  - Mental health services will be specific to the needs of the individual based on where they are in the asbestos exposure, disease, and care continuum
  - Education about the mental health impacts associated with exposure/risk, diagnosis, disease, and long-term care (health care, palliative care, research, and economics, etc.).
  - Crisis counseling services to identify and remediate mental health issues secondary to asbestos exposure.
  - Crisis counseling services to facilitate adaptation to chronic stress, chronic illness, grief, and terminal illnesses.

**Collaborative Partners:**OrganizationCollaborative Relationship

Mental Health Center

Referrals for individuals with significant mental health issues,  
On-site ARD mental health education and services as needed for clientele and/or staff that are providing long term services to ARD patients.

MASSA - State of Montana

Use CORA, on-site and via referral, for mental health consultations and initial impact support. CORA refers to MASSA for screening/info.

SJLH

Providing in-kind space and IS support to CORA. Coordination with SJLH Community Outreach Social Worker, Home Health and Hospice, as well as in-patient mental health consultations related to ARD.

RHOG - Lincoln County

Coordination with ARD Net case manager: CORA will provide mental health information and support services; short term crisis counseling for sub-clinical issues and mental health/substance abuse assessments. RHOG case manager providing resource referral and practical assistance for non-mental health needs.

Other Potential Partners

Local partners?

Libby Care Center?  
CHC?  
Libby School District?  
HCI?

Partners outside the local community?

Center for Mental Health Services?

For more information contact:

Tanis Lincoln, L.C.S.W.  
Center for Asbestos Related Diseases  
308 Louisiana Ave.  
Libby, MT 59923  
(406) 293-9274  
tlinc@sjlh.com

### Appendix 3

Environmental Justice Collaborative Problem Solving Grant Program  
Linda K. Smith, Project Officer  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave. NW  
Washington, D.C. 20460 – 0001

September 11, 2003

We the undersigned representatives of the Libby Community Advisory Group, wholeheartedly lend our support to the Center for Asbestos Related Diseases' (CÄRD) request for grant funding through the Environmental Justice Collaborative Problem Solving Grant Program. We applaud the proposed collaborative efforts of the CÄRD, St. John's Lutheran Hospital; Northwest Montana Mental Health Center; the Montana Asbestos Screening and Surveillance Activities (MASSA) program; the Lincoln County Health Department's Asbestos Related Disease Network (ARD Net); and the \_\_\_\_\_. Through this type of collaboration, the CAG believes that several important objectives may be achieved.

Firstly, the program will provide much needed direct services to victims of asbestos exposure and asbestos related diseases (ARD) from the Libby exposure through skilled psycho-social assessment and intervention. Secondly, it addresses mental health needs in a collaborative process in a variety of settings across the life span of those impacted. This collaborative outreach model has been proven to be more effective than stand alone projects.

Surveys of the affected population have shown that significant numbers continue to report: struggles with feelings of grief, anger, frustration and depression; concerns over their financial and health status; and anxiety over their own and their children's futures. These issues impact not only individuals, but also all service providers working to address tangible needs related to exposure and clean up. By linking the various pieces of the asbestos response and providing mental health expertise and support at every point of contact, the program will enhance the community wide adaptation to this disaster and improve the quality of life for all participants.

The Center for Asbestos Related Diseases has been at the forefront of the remedial response to the health crisis in our community since July of 2000. Ms. Lincoln has been a trusted member of the CÄRD team, and her continued services are vital. We believe that the design of this program is sound and that its goals are achievable. We continue to believe that the solutions to our community's crisis can be found by working with the strengths of our community's individual members and existing organizational structures. We support fully your efforts to fund this program.

Sincerely,

The Libby Community Advisory Group

(Signature Page Attached)

**Appendix 4**  
**Libby Area Technical Assistance Group, Inc.**  
**P.O. Box 53, Libby, MT 59923**  
**293-7446**

**Action Items Resulting from**  
**JULY 15, 2003**  
**Special Board Meeting**

August 8, 2003  
Jim Christiansen  
EPA, Libby Office  
Libby, MT 59923

**EPA Action Items arising as a result of the July 15<sup>th</sup> LATAG special meeting with the EPA:**

*For each action item below please advise estimated completion date. Also, identify the individual/departments responsible for completion tracking and follow-up purposes.*

1. The community has been well educated by the EPA that there is no amount of tremolite asbestos that is safe, hence the EPA's original commitment to remove tremolite asbestos from Libby. The community has been subsequently told that containment would be utilized when removal was deemed impossible (e.g., walls, etc.). Now we are advised, via the EPA Contractor work agreements for individual homes that the clean-up will be to the point of Aminimal release@. **Action item: Provide the revised science rationale behind the EPA's shift in clean-up policy from Aremoval@ during the Emergency clean-up phase to Acontainment@ in the interim to Aminimal release@ for remaining Superfund clean-up activity. Additionally furnish a video for public information/education depicting "minimal release" processes/procedures derived from this revised science.**
2. With respect to the varying methods observed in maintaining vehicular cleanliness leaving Libby sites. **Action Item: Provide the vehicle decontamination procedures, CDM=s oversight policy on those procedures and EPA=s regulations.**
3. **Establish/provide policy that will prohibit workers from bringing their private rigs onto clean-up sites, thereby reducing potential cross-contamination of sites.**
4. **Provide the policy for placement of air monitors and monitoring at clean-up sites and furnish data copy of past/current ambient air reports.**
5. **Provide policy and procedures for conducting interior/exterior air quality tests (detail to include, but not limited to, electrical outlets, heat system vents/ducting and blanking/sealing off requirements).**
6. **Provide science/supporting reasoning behind carpets not being removed from contaminated sites.**
7. **Provide the EPA and Contractor policy and procedures concerning worker health/safety in and around clean-up sites (e.g., face mask and protective clothing utilization). Additionally advice will be given contractors that on-site smoking is blatant disregard of the health message to be conveyed to the community.**

8. Regarding the possibility of going back at set periods of time to retest, the EPA's response that this would be done during the Remedial Investigation phase, and to assure continuity in conduct of valid and meaningful follow-up testing. **Action item: Provide the policy and procedures for doing follow-up air quality testing of homes.**

9. **Provide the science in support of the policy change from encapsulating a home in a bubble to the varying degrees (e.g., small plastic fencing) of clean vs. contaminated boundary definition apparatus currently in use.**

10. In support of the statement "We are comfortable with a small amount of exposure". **Action item: Quantify/provide this level of comfort (amount of acceptable exposure) describing the science behind why heating system vents and ducts do not need to be cleaned of asbestos beyond vacuuming where we can reach@.**

11. **Establish/provide revised/updated Chris Weis studies and risk models replacing those deemed "flawed and outdated" for ease in reconciliation and validation of issues.**

12. Currently homeowner=s personal possessions are placed in plastic bags during the clean up of the house and left that way thru turn over to the owner and after passing the air quality test. **Action item: Provide the policy/procedure concerning people=s personal belongings/possessions that are in the clean up site, testing in other than actual home environment (e.g. bagged possessions) conditions, and whether EPA is responsible for cleaning or replacing them.**

13. **Provide clarification of the EPA's procedure delegating responsibility to the contractor for approval that an individual clean-up site is complete allowing homeowners to move back in. Additionally clarify who is responsible if it is then found that the site was not clean with individuals/belongings re-contaminated and put at renewed risk.**

14. It was indicated that a procedure would be formalized by the EPA as to what an individual should do when they encounter contamination in the course of their work. **Action item: Provide a description of contamination that an individual could be looking for, what to avoid, action to be taken, and reporting procedure which includes a "chain of command" directory pertaining to who is in charge when/where with emergency contact numbers.**

15. The question was brought up about Aclean vermiculite@ and/or Anon-detect@. Concern was expressed that the matter of non-detect might just be the equipment EPA has on site is not capable of detecting. **Action item: Describe/provide the quality/degree of testing that is being conducted on-site in Libby, how it differs from lab testing done off-site and rationale behind any allowable difference.**

16. **Provide the rough drafts of Acomfort letters@ for review and comment before finalizing. Decide/provide whether specific information concerning individual real estate will be included or not.**

17. **Establish/provide follow-up claim responsibility policy for cleaned up sites after the EPA moves on, the state=s, the homeowner=s, and the EPA's.**

18. **Determine/provide policy for what happens in the future regarding those properties**

**where an owner refuses to have his property cleaned.**

Sincerely,

George Keck  
Chair